

**In the United States District Court
for the District of Puerto Rico**

METROPOLITAN LIFE INS. CO.,

Plaintiff

v.

NATIONAL COMMUNICATIONS SYS., INC.
ET AL.,

Defendants.

CIVIL NO. 97-233 1 (DRD)

RE: BREACH OF CONTRACT,
DAMAGES AND FRAUD

Statement of Anthony Zitrin, Esq.

I, Anthony Zitrin, hereby declare under penalty of perjury:


1. I reside in Scarsdale, New York. My place of work is in Long Island City, New York. I am submitting this statement in connection with a motion to quash subpoenas duces tecum I recently received.
2. I am an attorney by profession and am currently employed as Senior Counsel (an attorney position) in the Law Department at Metropolitan Life Insurance Company ("MetLife"). I am admitted to the bar in New York and New Jersey.
3. As part of my functions as an attorney at MetLife, I provide MetLife with advice on legal matters. In that context, I was asked by MetLife to provide legal advice and legal services with respect to this matter.
4. I was not in any way involved in the facts pertaining to this lawsuit. My only participation in the above-captioned matter has

been for purposes of providing MetLife with legal advice and legal services related thereto.

5. Consequently, any information I have pertaining to this matter was obtained within the scope within the scope of my functions as an attorney for MetLife and is protected by the attorney-client privilege and the work product doctrine.

6. I verify under penalty of perjury that the foregoing is true and correct.

Executed on February 26, 2004.



Anthony Zitrin